IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA ex re	al.
CAMERON JEHL,	

Plaintiffs,

v.

Case No. 3:19cv091-MPM-JMV

GGNSC SOUTHAVEN LLC D/B/A GOLDEN LIVING CENTER-SOUTHAVEN et al.

Defendants.

DEFENDANTS' RESPONSE IN OPPOSITION TO RELATOR'S MOTION TO APPROVE SECURITY FOR APPEAL AND DEPOSIT THE FUNDS IN THE REGISTRY OF THE COURT

Defendants respectfully submit their Joint Response in Opposition to Relator's Motion to Approve Security for Appeal and Deposit the Funds in the Registry of the Court.

The Opposition is supported by the following exhibit and the supporting Memorandum of Law filed herewith:

Exhibit 1 – [Proposed] Order Setting Amount of Security for Appeal and Authorizing

Deposit of the Funds in the Registry of the Court.

April 23, 2024

Respectfully submitted,

/s/ Margaret Sams Gratz

Margaret Sams Gratz, Esq. (MSB # 99231) Gratz & Gratz, P.A. 312 North Green St. Tupelo, MS 38804 Tel (662) 844-5531 Fax (662) 844-8747 margaret@gratzandgratz.com Robert Salcido (*pro hac vice*) D.C. Bar No. 447951 California Bar No. 139138 Akin Gump Strauss Hauer & Feld LLP 2001 K Street, N.W. Washington, D.C. 20006 Telephone: 202-887-4000 Facsimile: 202-887-4288

rsalcido@akingump.com

Attorneys for Defendants
GGNSC Southaven LLC D/B/A Golden
LivingCenter-Southaven; GGNSC
Administrative Services LLC; GGNSC
Clinical Services

CERTIFICATE OF SERVICE

This is to certify that I, Robert Salcido, one of the attorneys for GGNSC Southaven, LLC individually and on behalf of all Defendants have this day furnished a true and correct copy of the above and foregoing DEFENDANTS' RESPONSE IN OPPOSITION TO RELATOR'S MOTION TO APPROVE SECURITY FOR APPEALAND DEPOSIT THE FUNDS IN THE REGISTRY OF THE COURT to the following via ECF filing:

Robert B. McDuff (MSB # 2532) Law Office of Robert B. McDuff 767 North Congress Street Jackson, MS 39202 Telephone: 601.259.8484 rbm@mcdufflaw.com

Richard R. Barrett (MSB #99108) Law Office of Richard R. Barrett, PLLC 2086 Old Taylor Road Suite 1011 Oxford, MS 38655 Telephone 662.380.5018 rrb@rrblawfirm.net

Philip N. Elbert, Esq.
Lisa P. Binder, Esq.
Nathan C. Sanders, Esq.
Neal & Harwell, PLC
1201 Demonbreun St., Suite 1000
Nashville, TN 37203
pelbert@nealharwell.com
lbinder@nealharwell.com
nsanders@nealharwell.com

This the 23rd day of April 2024.

/s/ Robert Salcido	
ROBERT SALCIDO	